1	Acting United States Attorney		
2 3	HALLIE HOFFMAN (CABN 210020)		
4 5	LLOYD FARNHAM (CABN 202231)		
6			
7	San Francisco, California 94102-3495 Telephone: (415) 436-7200		
8	FAX: (415) 436-7234 adawson@usdoj.gov		
9	Attorneys for United States of America		
10	UNITED STATES DISTRICT COURT		
11	NORTHERN DISTRICT OF CALIFORNIA		
12	SAN FRANCISCO DIVISION		
13			
14	UNITED STATES OF AMERICA,	CASE NO. 20-CR-00249 RS	
15	Plaintiff,	STIPULATION AND ORDER	
16) v.	CONTINUING STATUS CONFERENCE AS MODIFIED BY THE COURT	
17	ROWLAND MARCUS ANDRADE,		
18	Defendant.		
19	,		
20		farance on March 9, 2021, at 2:30nm. Since this	
	This matter is currently set for a status conference on March 9, 2021, at 2:30pm. Since this		
21	Court ruled on defendant's Motion to Compel via an Order entered on January 26, 2021, the government		
22	has continued to produce discovery. The government's most recent production was sent to the defense		
23	on February 1, 2021. The defense team is currently reviewing those materials. The government is		
24	currently processing and preparing its next production of documents.		
25	The discovery in the case is voluminous, and the parties request an approximate 60-day		
26	continuance in order to provide the defense with the opportunity to continue to review these discovery		
27	materials, and for the government to continue production	lucing documents. The parties also request that the	
28	Court exclude time from the Speedy Trial Act dead	Court exclude time from the Speedy Trial Act deadlines on the basis that the proposed continuance will	
	STIPULATION AND [PROPOSED] ORDER 1 CASE NO. 20-CR-00249 RS		

Case 3:20-cr-00249-RS Document 45 Filed 03/04/21 Page 2 of 2

allow for the effective preparation of counsel. The parti	es agree that the ends of justice served by this	
continuance outweigh the best interest of the public and the defendant in a speedy trial. The parties		
further agree that the failure to grant this continuance would unreasonably deny counsel for defendant		
the reasonable time necessary for effective preparation, taking into account the exercise of due diligence.		
Accordingly, the parties agree that the period from March 9. 2021 through May 11, 2021, or the date of		
the continued Status Conference, should be excluded in accordance with the provisions of the Speedy		
Trial Act, 18 U.S.C. §§ 3161(h)(7)(A) and (B)(iv), for effective preparation of defense counsel, taking		
into account the exercise of due diligence.		
IT IS SO STIPULATED.		
DATED: March 3, 2021	Respectfully submitted,	
	STEPHANIE M. HINDS	
	Acting United States Attorney	
	ANDREW F. DAWSON	
	Assistant United States Attorney	
	ZUBER LAWLER & DEL DUCA LLP	
	BRIAN J. BECK	
,	Attorney for Defendant	
ORDER		
For the reasons stated in the stipulation of the parties above, and for good cause shown, the		
Court hereby orders that the Status Conference currently set for March 9, 2021 is vacated and reset for		
May 11, 2021, at 2:30 p.m. It is further ordered that time is excluded, pursuant to 18 U.S.C. §§ 3161(h)		
(7)(A) and (B)(iv) through May 11, 2021.		
(7)(A) and (B)(iv) through May 11, 2021.	01101	
	NORARI E RICHARD GERORG	
DATED: March 4, 2021	NORABLE RICHARD SEEBORG ef United States District Judge	
DATED: March 4, 2021	NORABLE RICHARD SEEBORG	
	continuance outweigh the best interest of the public and further agree that the failure to grant this continuance we the reasonable time necessary for effective preparation, Accordingly, the parties agree that the period from March the continued Status Conference, should be excluded in Trial Act, 18 U.S.C. §§ 3161(h)(7)(A) and (B)(iv), for e into account the exercise of due diligence. IT IS SO STIPULATED. DATED: March 3, 2021 ORDED For the reasons stated in the stipulation of the particular court hereby orders that the Status Conference currently court hereby orders that the Status Conference currently continued to the particular cont	